

IN THE DISTRICT/SUPERIOR COURT FOR THE STATE OF ALASKA
AT ANCHORAGE

Angela D. Robinson-Sweat

Plaintiff(s),

vs.

Harlan W. Blackburn and Alaska
Rent-A-Car, Inc.

Defendant(s).

CASE NO. 3AN-19-abale CI

**SUMMONS AND
NOTICE TO BOTH PARTIES
OF JUDICIAL ASSIGNMENT**

To Defendant: Harlan W. Blackburn

You are hereby summoned and required to file with the court a written answer to the complaint which accompanies this summons. Your answer must be filed with the court at 825 W. 4th Ave., Anchorage, Alaska 99501 within 20 days* after the day you receive this summons. In addition, a copy of your answer must be sent to the plaintiff's attorney or plaintiff (if unrepresented) Crowson Law Group, whose address is:
637 A Street, Anchorage, AK 99501

If you fail to file your answer within the required time, a default judgment may be entered against you for the relief demanded in the complaint.

If you are not represented by an attorney, you must inform the court and all other parties in this case, in writing, of your current mailing address and any future changes to your mailing address and telephone number. You may use court form *Notice of Change of Address / Telephone Number* (TF-955), available at the clerk's office or on the court system's website at www.courtrecords.alaska.gov/webdocs/forms/tf-955.pdf to inform the court. - OR - If you have an attorney, the attorney must comply with Alaska R. Civ. P. 5(i).

NOTICE OF JUDICIAL ASSIGNMENT

TO: Plaintiff and Defendant

You are hereby given notice that:

☐ This case has been assigned to Superior Court Judge _____ and to a magistrate judge.

☒ This case has been assigned to District Court Judge Washington
CLERK OF COURT

9.5.19
Date



By: [Signature]
Deputy Clerk

I certify that on 9.5.19 a copy of this Summons was ☐ mailed ☒ given to
☐ plaintiff ☒ plaintiff's counsel along with a copy of the
☐ Domestic Relations Procedural Order ☐ Civil Pre-Trial Order
to serve on the defendant with the summons.
Deputy Clerk [Signature]

* The State or a state officer or agency named as a defendant has 40 days to file its answer. If you have been served with this summons outside the United States, you also have 40 days to file your answer.

CIV-100 ANCH (10/17)(cs)
SUMMONS

Civil Rules 4, 5, 12, 42(c), 55

IN THE DISTRICT COURT FOR THE STATE OF ALASKA

THIRD JUDICIAL DISTRICT AT ANCHORAGE

ANGELA D. ROBINSON-SWEAT)

Plaintiff.)

vs.)

HARLAN W. BLACKBURN and)
ALASKA RENT-A-CAR, INC.)

Defendants.)

Case No. 3AN-19-_____CI

COMPLAINT

COMES NOW Plaintiff, ANGELA D. ROBINSON-SWEAT by and through her counsel, CROWSON LAW GROUP, and files suit against Defendants, HARLAN W. BLACKBURN and ALASKA RENT-A-CAR, INC. and alleges the following:

1. Plaintiff ANGELA D. ROBINSON-SWEAT, for all times mentioned herein, was and is a resident of the Municipality of Anchorage Borough, State of Alaska.

2. Plaintiff is informed and believes and therefore alleges that Defendant HARLAN W. BLACKBURN, for all times mentioned herein, was and is a resident of County of King, City of Renton, State of Washington.

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3. Defendant ALASKA RENT-A-CAR, INC. is, and at all times relevant was, a corporation organized and existing under the laws of the State of Alaska, with its principal place of business in Anchorage, Alaska.

4. Service on Defendant ALASKA RENT-A-CAR, INC. will be made through its Registered Agent Andrew Halcro, 4900 S. Aircraft Drive, Anchorage, AK 99502.

5. At all times herein mentioned, Plaintiff ANGELA D. ROBINSON-SWEAT was the driver of a certain Alaska Yellow Cab, 2013 Dodge, Alaska license plate number KCN 102.

6. At all times herein mentioned, Defendant ALASKA RENT-A-CAR, INC. was the owner of a certain 2016 Chevrolet Impala, Alaska license plate number JDE 922.

7. At all times herein mentioned, Defendant, HARLAN W. BLACKBURN was the driver of a certain 2016 Chevrolet Impala, owned by Alaska Rent-A-Car, Alaska license plate number JDE 922.

8. The accident described below occurred in the Municipality of Anchorage Borough and, as a result, venue properly lies with this Court.

9. Jurisdiction properly lies with this Honorable Court.

10. That on or about December 6, 2018, at approximately 5:07 p.m., Plaintiff ANGELA D. ROBINSON-SWEAT was stopped at a solid red traffic

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16. Defendant HARLAN W. BLACKBURN was negligent in the following particulars, among others, to-wit:

- a. Failure to keep his vehicle under control;
- b. Failure to give full time and attention;
- c. Failure to keep a proper lookout;
- d. Unreasonable operation of a vehicle under conditions existing;
- e. Failure to reduce speed to avoid collision;
- f. Failure to obey road directional signage;
- g. Failure to obey traffic control devices;
- h. Negligent driving; and
- i. Reckless driving.

17. Defendant ALASKA RENT-A-CAR, INC. was negligent in the following particulars, among others, to-wit:

- a. Failure to properly screen lessees of its motor vehicles;;
- b. Failure to ensure lessees of its vehicles were familiar with the roadway laws of the Municipality of Anchorage;
- c. Failure to ensure the safety of others on the road;
- d. Failure to screen its lessees for prior motor vehicle violations;
- e. Negligent leasing of its vehicles; and
- h. Reckless leasing of its vehicles.

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18. That the collision hereinabove stated was solely due to the negligence of the Defendants HARLAN W. BLACKBURN and ALASKA RENT-A-CAR, INC., without any comparative negligence whatsoever by the Plaintiff ANGELA D. ROBINSON-SWEAT.

19. As a direct and proximate result of the collision described above, Plaintiff ANGELA D. ROBINSON-SWEAT was caused to sustain severe and permanent injury; caused to incur medical and veterinary bills and expenses; and was caused to endure pain and suffering. Furthermore, Plaintiff ANGELA D. ROBINSON-SWEAT was precluded from enjoying her usual avocations.

20. The injuries, grievances and damages as hereinabove set forth, were caused by the carelessness, negligence, and recklessness of the Defendants HARLAN W. BLACKBURN and ALASKA RENT-A-CAR, INC. as stated herein, without any carelessness, negligence or recklessness on the part of the Plaintiff ANGELA D. ROBINSON-SWEAT contributing thereto.

21. Defendants' HARLAN W. BLACKBURN and ALASKA RENT-A-CAR, INC.'S conduct in operating a vehicle in the manner described above was not only a failure to use ordinary care but was such an extreme departure from the standard of ordinary care as to constitute gross negligence for which punitive damages are warranted.

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WHEREFORE, Plaintiff ANGELA D. ROBINSON-SWEAT prays judgment against the Defendants HARLAN W. BLACKBURN and ALASKA RENT-A-CAR, INC. as follows:

1. For general damages including, but not limited to, pain and suffering and mental anguish both in the past and in the future.
2. For all medical and incidental expenses according to proof.
3. For all lost wages past and future according to proof.
4. For costs of suit herein incurred.
5. For punitive damages.
6. That this case be tried by jury.
7. For any and all other all damages and relief to which Plaintiff ANGELA D. ROBINSON-SWEAT is entitled under the laws of the State of Alaska.

Respectfully submitted on this the 5th day of September 2019.

CROWSON LAW GROUP
Attorney for Plaintiff

By: 

Mark D. Rayburn
ABA #1609067
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